

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

SCHNADER HARRISON SEGAL & LEWIS
LLP,

Plaintiff,

v.

LOREN W. HERSHEY,

Defendant

Civil No. 1:12-CV-00928-AJT/IDD

**MOTION FOR LEAVE UNDER LOCAL RULE 7(F)
TO FILE A MOTION WITHOUT A BRIEF**

Schnader Harrison Segal & Lewis LLP (“Schnader”) seeks leave under Local Civil Rule 7(F) to file its Motion for Rule 11 Sanctions and Motion for Sanctions Pursuant to 28 U.S.C. § 1927 without briefs and requests that the Court issue a briefing schedule on the two motions for sanctions following the Court’s disposition of the underlying claims, whether by summary judgment or following trial.

1. Pursuant to Local Rule 7(F)(1), the Court may allow a party to submit a motion without a brief.

2. Such relief is especially warranted where, as here, the sanctionable conduct began at the pleading stage and continues through the course of ongoing litigation. Therefore, the exact parameters of Mr. Hershey’s conduct warranting sanctions, and the full scope of the evidence to support same, will remain unknown until the Court decides the merits of the underlying claims.

For the foregoing reasons, Schnader requests that the Court grant it leave to file its Motion for Rule 11 Sanctions and Motion for Sanctions Pursuant to 28 U.S.C. § 1927 without briefs and issue a briefing schedule on those motions following the Court's decision on the merits of the underlying claims.

Dated: March 14, 2013

SCHNADER HARRISON SEGAL & LEWIS LLP

/s/ Jonathan M. Stern

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